Ex. A Parties' Scheduling Proposals

Event	Plaintiff's Proposed Deadline	Defendants' Proposed Deadline	Authority
Initial Disclosures Fed. R. Civ. P. 26(a)(1)	October 26, 2023	Same as Plaintiff	Dkt. 17
Defendant's Infringement Contentions	No later than 14 days after Defendants serve their answer	Same as Plaintiff	LPR 120
Plaintiff's preliminary invalidity and non-infringement contentions	No later than 30 days after Defendants serve their infringement contentions.	Same as Plaintiff	LPR 121
Exchange of proposed terms and claim elements for construction	20 days after service of Plaintiff's preliminary invalidity contentions	Same as Plaintiff	LPR 130(a)
Exchange of preliminary claim constructions and extrinsic evidence	30 days after exchange of proposed terms and claim elements for construction.	Same as Plaintiff	LPR 131(a)
Joint claim construction and prehearing statement	45 days after service of preliminary claim constructions	Same as Plaintiff	LPR 132
Completion of claim construction discovery	50 days after service of joint claim construction statement	Same as Plaintiff	LPR 133
Opening claim construction brief	5 days after completion of claim construction discovery	Same as Plaintiff	LPR 134(a)
Responsive claim construction briefs	15 days after filing of the parties' opening claim construction briefs	Same as Plaintiff	LPR 134(c)
Claim construction hearing	At the convenience of the Court	Same as Plaintiff	
Deadline to join additional parties	January 3, 2024	Same as Plaintiff	
Document Production substantially complete	January 12, 2024	Same as Plaintiff	
Fact discovery cut-off	February 16, 2024	Same as Plaintiff	
Opening expert reports	March 8, 2024	21 days after service by the Court of its Claim Construction Ruling	

Production of opinion(s) of counsel and service of privilege log by party defendant against a claim of willful infringement	N/A – There are no claims of willful infringement in this case	30 days after service by the Court of its Claim Construction Ruling	LPR 140
Rebuttal expert reports	March 29, 2024	21 days after service of Opening expert reports	
Expert discovery cut-off	April 12, 2024	21 days after service of Rebuttal expert reports	
Opening case dispositive and Daubert motions	May 6, 2024	21 days after Expert discovery cut-off	
Responsive case dispositive and Daubert motions	June 10, 2024	21 days after service of Opening case dispositive and Daubert motions	
Reply case dispositive and Daubert motions	July 9, 2024	14 days after service of Responsive case dispositive and Daubert motions	
Parties to file joint proposed final pretrial order	5:00 p.m. four business days before the final pretrial conference	Same as Plaintiff	
Final pretrial conference	To be determined by the Court	Same as Plaintiff	
Trial	To be determined by the Court	Same as Plaintiff	